

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Ivex Corporation
Attn: Jim Craven
8100 South 77th Avenue
Bridgeview, Illinois 60455

<u>Application No.:</u> 92070010	<u>I.D. No.:</u> 031027AAU
<u>Applicant's Designation:</u> OPPE0982	<u>Date Received:</u> March 8, 2004
<u>Subject:</u> Corrugate Board, Paper Convert and Print	
<u>Date Issued:</u> April 19, 2004	<u>Expiration Date:</u> October 27, 2005
<u>Location:</u> 8100 South 77th Avenue, Bridgeview	

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three corrugators controlled by three cyclones, three padded envelops flexo printing/folding/gluing machines controlled by cyclones and baghouses (Jet Pak 1, Jet Pak 2 and Jet Pak 3), five folding/gluing bag making machines (Jet Lite 1, Jet Lite 2, Jet Lite 3, JLP-1 and JLP-2), one printer/coater (Kidder), one printer (Wolverine), one blown film machine with printer, one coater (Michelman), two Jet Core machines (Jet Core 6 and Jet Core 7), and one boiler pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
- 2a. This permit is issued based upon the flexographic printing presses not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart H: Printing and Publishing, Section 218.401: Flexographic and Rotogravure Printing. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year from the subject sources.
- b. This permit is issued based upon the gluing operations not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart PP: Miscellaneous Fabricated Product Manufacturing Process. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year from the subject sources.

3. Usage of raw materials and VOM emissions shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u> (Wt %)	<u>VOM Emissions</u>	
	(Tons/Mo)	(Tons/Yr)		(Tons/Mo)	(Tons/Yr)
Inks	1.7	16.6	20.0	0.33	3.3
Latex (Coating)	6.6	65.7	8.5	0.57	5.6
Latex (Adhesive)	112.5	1,125.0	0.1	0.11	1.1
Bottom Paste	35.0	340.0	0.5	0.18	1.7
Cold Glue	91.0	909.3	0.5	0.46	4.5
Hot Melt Adhesive	12.0	113.5	0.1	0.01	0.1
Lamination Glue	53.0	520.3	0.7	0.37	3.6
Cleanup Solvent	0.32	3.2	100.0	0.32	3.2
HD Polyethylene	300.0	3,000.0	0.004	0.01	0.1
				Total:	23.2

These limits define the potential emissions of the VOM and HAPs and are based on the maximum actual emissions determined from the maximum production capacity and VOM content of raw materials. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

4. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
5. Operation and emissions of the boiler shall not exceed the following limits:

Natural Gas Consumption: 11 mmscf/mo, 110 mmscf/yr

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	(Lb/mmscf)	(Ton/Mo)	(Ton/Yr)
Nitrogen Oxide (NO _x)	100	0.55	5.5
Carbon Monoxide (CO)	84	0.46	4.6

These limits are based on the maximum firing rate and standard AP-42 emission factors for natural gas combustion. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

6. This permit is issued based on negligible emissions of particulate matter from the envelopes and bags making machines. For this purpose emissions shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.
7. The Permittee shall maintain monthly records of the following items:
- Names and amounts of inks, glues and other VOM containing materials used (tons/mo);

- b. VOM and HAP content of materials in item (a) (wt %);
 - c. VOM and HAP emission calculations (ton/mo); and
 - d. Natural gas consumption (mmscf/mo).
8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.
9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.
10. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year: annual ink usage, coating usage, clean up solvent usage, etc., from the prior calendar year. If there have been no exceedances during the previous calendar year the Annual Emission Report shall include a statement to that effect.

It should be noted that this permit has been revised to adjust material usage limits without any increase in emissions. This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Corrugated Boards, Envelops and Paper Bags Manufacturing Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is use of 21.3 tons of inks, 1,883 tons of glues and adhesives and 1.5 tons of clean-up solvents per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

<u>Emission Units</u>	<u>VOM</u>	<u>PM</u>	<u>NO_x</u>	<u>CO</u>	<u>Single HAP</u>	<u>Total HAP</u>
Envelop/Bag Making Machines	23.2	0.44			< 10	< 25
Boiler			5.5	4.6		

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